

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application in compliance for allowance. The present amendment is made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-21 are pending in this application. Claims 1, 8, and 15 are independent and hereby amended. No new matter has been added. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. SUPPORT FOR AMENDMENT IN SPECIFICATION**

Support for this amendment is provided throughout the Specification as originally filed and specifically at paragraph [0174] of Applicants' corresponding published application. By way of example and not limitation:

[0174] As described above, HD compressed data for one frame are transferred, in each time period for one frame, from the workstation 1 to the PCI cards 8 and 14, and the transferred HD compressed data for each frame are sequentially subjected to the edit processing (shown in FIGS. 6, 8, or 10) that is performed by the PCI cards 8 and 14 or the PCI cards 8, 14, and 16. Thus, edit processing involving a special-effect-applied scene change (e.g., a scene change in which the scene of material A changes into the scene of material B while disappearing in a page-turning manner) is performed in real time.

### III. RESPONSE TO REJECTIONS UNDER 35 U.S.C. 103(a)

Claims 1-5, 7-12, 14-19 and 21 were rejected under 35 U.S.C. §103(a) as allegedly anticipated by U.S. Patent No. 6,226,038 to Frink et al. (hereinafter, merely "Frink") in view of Nerwin v. Erlichman 168 USPQ 177<sup>1</sup>. Applicants response addresses the deficiencies of Frink as a primary reference and also take exception to a rejection based on case law. Indeed, Applicants presume that the citation to case law is merely to assert that the deficiencies of Frink are obvious. Applicants respectfully traverse this assertion by the Office Action.

Claims 6, 13 and 20 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Frink in view of Nerwin v. Erlichman 168 USPQ 177 and further in view of U.S. Patent Application Publication 2002/0168036 A1 to Kim (hereinafter, merely "Kim").

Claim 1 recites, *inter alia*:

"...edit processing means for performing edit processing on the high-definition television video data decompressed by the first decoder and the high-definition television video data decompressed by the second decoder, a result of edit processing performed by the edit processing means being output,

wherein the high-definition television video data decompressed by the first decoder and the high-definition television video data decompressed by the second decoder for one frame, are transferred, in each time period for one frame, in parallel to a first PCI card and a second PCI card, respectively." (Emphasis added)

Applicants submit that neither Frink nor Nerwin v. Erlichman 168 USPQ 177, taken alone or in combination, that would disclose or render predictable the above identified

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<sup>1</sup> Applicants respectfully submit that citation to case law is not an appropriate grounds of rejection and respectfully request the Examiner provide a teaching in the art as a basis of rejection.

Specifically, the Office Action (see page 4) asserts that Frink discloses a first decoder, a second decoder and an edit processing device, and refers to Frink, Fig. 5, which is reproduced as follow:



Therefore, Applicants submit that independent claim 1 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 1, independent claims 8 and 15 are also patentable, and Applicants thus respectfully request reconsideration of the rejections thereto.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Applicants thereby respectfully request reconsideration and withdrawal of rejections thereto. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

#### **CONCLUSION**

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.


In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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